

**ADDENDUM TO THE FACT SHEET  
FOR NATIONAL POLLUTANT DISCHARGE  
ELIMINATION SYSTEM (NPDES)  
PERMIT NO. WA-005104-7**

**I. GENERAL INFORMATION**

Wells Hydroelectric Project  
28905 Highway 97  
Pateros, WA 98846

**II. APPLICATION REVIEW**

An application for permit reissuance was submitted to the Department of Ecology on July 17, 2003, and accepted by the Department on July 21, 2003. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the Permittee's waste treatment practices; nature, content, and frequencies of Permittee's discharge; either pursuant to the submission of new forms and applications or pursuant to monitoring records and reports resubmitted to the Department by the permittee;
- That the Department has determined that due to recent minor equipment installation and operation modifications the Permittee is now in compliance with the limits of the previous permit and there is a high probability of the facility operating in compliance in the next permit term; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for the Wells Hydroelectric Project and discharge monitoring reports (DMRs) were reviewed and they indicate no major change in the treatment characteristics of the effluent process or volume of wastewater have occurred.

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### **III. PERMIT REAUTHORIZATION**

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to the Wells Hydroelectric Project for the discharge of wastewater to the Columbia River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet adequately addressed conditions and issues at the facility at the time when the previous permit was issued. The Department has not received any information during the course of the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. The Department assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during the Department's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

There are no changes necessary to the previous permit conditions based on the following tables. There is however a correction to S7, Letter of Proposal, that states if the permittee plans an upgrade to the disinfection process with ultraviolet (UV) the letter shall be approved by a professional engineer certified in the State of Washington and be in compliance with WAC 173-240.

Table 1 characterizes the influent as reported this permit term (1998-2003) and compares as a percent increase or decrease those parameters to those reported during the previous term (1993-1998).

**Table 1 Influent Characterization Compared to Plant Design Criteria**

Parameter	Design Criteria	Influent
Maximum Monthly Average Flow in Gallons per Day (GPD)	0.004	Maximum Daily Flow .002
BOD Influent Loading	10 lbs/Day	Average Monthly 4.54 lbs/Day
TSS Influent Loading	11.7 lbs/Day	Average Monthly 7.08 lbs/Day

Table 2 is a direct comparison of the effluent parameters reported this current permit term (1998-2003) with the previous five year permit term (1993-1998).

**Table 2 Effluent Characterization Compared to Permit Limits and Past Effluent Characterizations**

Parameter	Limits		Cumulative Average		Lowest Monthly Average		Highest Monthly Average	
	Avg. Monthly <sup>1</sup>	Avg. Weekly <sup>2</sup>	1993-1998	1999-2003	1993-1998	1999-2003	1993-1998	1999-2003
Flow (MGD)	Max. Daily <sup>3</sup> 0.004		0.000730	0.0011	0.000606	0.001	.000865	0.004
BOD (mg/L)	30	45	5.1	4.6	2.	0.5	14.5	15.5
TSS (mg/L)	30	45	15.9	14.13	3	1.5	76 <sup>4</sup>	39.0 <sup>4</sup>
Residual Chlorine (mg/L)	1	1	0.58	0.52	0.45	0.10	0.71	0.937
Fecal Coliform	200 per 100 mL	400 per 100 mL	90.5		0		530	
pH	6 to 9 standard units		pH consistently between 6.7 and 7 standard units					

<sup>1</sup> The average monthly effluent limitation is defined as the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

<sup>2</sup> The average weekly effluent limitation is defined as the highest allowable average of daily discharge values over a set of seven (7) consecutive calendar days, calculated as the sum of all daily discharge values measured during a set of seven (7) calendar days divided by the number of daily discharge values measured during that set of calendar days.

<sup>3</sup> The maximum daily effluent limitation is defined as the highest allowable discharge during a calendar day.

<sup>4</sup> Highest values depicted are violations of the permit limits occurring in July 1995 and March 2003. Number of violations in the 1993-1998 permit term is 8. Number of violations in the 1998-2003 permit term is 9.

Table 3 contains the compliance history reported during the previous permit term. Based on conclusions from a recent visit to the Wells Hydroelectric Project by the Departmental roving wastewater trainer, the number of violations may be lower than indicated in the table 3.

**Table 3 Compliance History**

Year	Number of Violations		
	Fecal Coliform	Total Suspended Solids	Total Residual Chlorine
2000	0	0	3
2001	2	1	4
2002	12	4	1
2003 (Jan. to June)	4	1	0

It is the opinion of the Departmental facility manager and that of the Departmental roving wastewater treatment trainer, that through recent minor modifications to Wells Hydroelectric Project treatment plant operations and training, the treatment plant should be able to consistently meet the limits established in the previous permit, which met both secondary treatment and water quality standards. Therefore limits for the next permit term will remain the same.

In a letter to the Permittee dated May 30, 2003, the Department acknowledged that the installation of a programmable logic controller for chlorine dosing and mixing paddles will constitute operation and maintenance activities and as such does not require an engineering report. The Permittee will conduct additional sampling following the installation of the programmable logic controller and mixing paddles. The DMRs for May and June 2003 report no violations have occurred. The modifications appear to be working as predicted.

On May 6 and 7, 2003 the Departmental roving wastewater trainer visited Wells Hydroelectric Project. He was able to provide training in the basic calculations for residual chlorine, which in previous instances have resulted in the reporting of a violation based on a higher value due to miscalculation. Fecal Coliform violations are suspected to be caused by a combination of problems, chief of which are inappropriate technique and inadequate mixing. The training provided and plant modification is expected to relieve these problems. The recent DMRs confirm these expectations.

Based upon the reasons stated above and the small volume of effluent entering the Columbia, the Department proposes to Reauthorize the permit for the next five (5) years. If during the course of the permit cycle the Department determines changes to the permit are needed, the Department will enact those changes through either an Administrative Order or a Permit Modification.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A - Public Involvement for more detail on the Public Notice procedures).

After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

#### **IV. RECOMMENDATION FOR PERMIT ISSUANCE**

The Department proposes that this permit be reauthorized for five years.

## **APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION**

The Department has tentatively determined to reauthorize a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on July 16, 2003 in the Wenatchee World to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on September 11, 2003 in the Quad City Herald to inform the public that a draft reauthorization permit, fact sheet, and fact sheet addendum are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator  
Department of Ecology  
Central Regional Office  
15 West Yakima Avenue, Suite 200  
Yakima, WA 98902

Any interested party may comment on the draft permit or request a public hearing on this draft reauthorization permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, 509/457-7105, or by writing to the address listed above.

This Addendum to the fact sheet was written by Rich Marcley.

## **APPENDIX B -- RESPONSE TO COMMENTS**

No comments were received by the Department of Ecology.